

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

IN RE:
WILLIAM JEFFREY BROOKS,
Debtor

JAMES L. DRAKE, JR., TRUSTEE,

Plaintiff

v.

B&A FLOWERS, LLC and
RHONDA DUGAN A/K/A
RHONDA DUGGAN,

Defendants

CHAPTER 7
CASE NO. 13-10860-SDB

ADVERSARY PROCEEDING
NO. 15-01023-SDB

MOTION TO WITHDRAW AS COUNSEL OF RECORD

COMES NOW, Todd Boudreaux, counsel of record for the Defendants in the above-captioned adversary proceeding, and pursuant to Local Rule 83.7, files this motion to withdraw as counsel of record, showing as follows:

1.

The Defendants retained the undersigned attorney to represent him in the adversary proceeding.

2.

Circumstances have arisen that require the undersigned attorney to withdraw as counsel of record in this case. Based upon these circumstances, the undersigned attorney can no longer render objective legal advice to the Defendants.

3.

By letter dated January 7, 2016, the undersigned advised the Defendants of the attorney's intent to withdraw from this case and that upon entry of an order relieving the undersigned as counsel of record in this case, it will be the responsibility of the Defendants to notify the Court of any change of address, to respond to any motions as needed, and to appear at all court proceedings. A true and accurate copy of the letter is attached hereto as Exhibit "A."

WHEREFORE, the undersigned respectfully requests that the Court grant this motion to withdraw as counsel of record, and grant such other and further relief as is just and proper.

Respectfully Submitted this 27th day of January, 2016.


s/Todd Boudreaux

TODD BOUDREAUX

Attorney for Defendants

Georgia State Bar No. 070023

BOUDREAUX LAW FIRM
493 Furys Ferry Road
Augusta, GA 30907
(706)869-1334

BOUDREAUX LAW FIRM

TODD BOUDREAUX

493 FURY'S FERRY ROAD
AUGUSTA, GA 30907
(706)869-1334 ♦ (706)869-3143 FAX

JENNA BLACKWELL MATSON

January 7, 2016

Rhonda Duggan
B&A Flowers, LLC
1385 Washington Road
Thomson, GA 30824

RE: *Drake v. B&A Flowers, LLC*
Adversary Proceeding No. 15-01023

Dear Ms. Duggan:

This letter follows our previous correspondence and conversations regarding the above-referenced Adversary Proceeding, and constitutes notice pursuant to Local Rule 83.7 that I will be filing a Motion to Withdraw as attorney of record in this Adversary Proceeding fourteen (14) days following the date of this letter.

Upon entry of an Order approving my withdrawal as attorney of record, I will no longer be responding to any pleadings, appearing at hearings, or handling any further matters in this case. As a legal entity organized under Georgia law, B&A Flowers, LLC cannot be represented by any individual who is not licensed to practice law in the State of Georgia. Therefore, neither you nor any other non-attorney individual will be allowed to appear at hearings or file pleadings in this case. Based upon the significant and complicated legal issues in this case, I recommend that you retain an attorney to represent the interest of the LLC in this case.

Thank you for your attention to this matter. If you have any further questions or need any additional information, please do not hesitate to give me a call.

Sincerely,



Todd Boudreaux

TB:cmw

CERTIFICATE OF SERVICE

This is to certify that a copy of the **MOTION TO WITHDRAW** was served upon the following parties by depositing said copy in the United States mail with adequate postage affixed, for the safe and proper delivery, addressed as follows:

— William Jeffery Brooks
3636 Five Points Jewel Road
Mitchell, GA 30820


B&A Flowers, LLC
c/o Albert H. Dallas
PO Box 1150
Thomson, GA 30824

Rhonda Duggan
99 Bussell Road
Warthen, GA 31094

James Drake
Chapter 7 Trustee
Via ECF/Electronic Notification

Office of the U.S. Trustee
Via ECF/Electronic Notification

This 27 day of January, 2016.


s/Todd Boudreaux
TODD BOUDREAUX
Attorney for Defendants
Georgia State Bar No. 070023

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493 Furrys Ferry Road
Augusta, GA 30907
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ORDER ON MOTION TO WITHDRAW

Todd Boudreaux filed a motion to withdrawal as counsel of record for the Defendants in the above-captioned adversary proceeding. After adequate notice, it is hereby

ORDERED, that Todd Boudreaux is hereby relieved as counsel of record for the Defendants.

[END OF DOCUMENT]

Order Prepared and Presented By:

s/Todd Boudreaux

Todd Boudreaux

BOUDREAUX LAW FIRM

493 Furys Ferry Road

Augusta, GA 30907

(706)869-1334